



# Fifth Program Year 2014

## Waukesha County Action Plan

The CPMP 2014 Annual Action Plan includes the [SF 424](#) and Narrative Responses to Action Plan questions that CDBG, HOME, HOPWA, and ESG grantees must respond to each year in order to be compliant with the Consolidated Planning Regulations. As of May 2006, the Executive Summary narratives are required.

## Narrative Responses

Updated with additional requirements (highlighted/in **BOLD**) as of 5/21/2007

### GENERAL

**GRANTEE: Waukesha County**  
**CON PLAN PERIOD: 2010 to 2014**

#### **Executive Summary (92.220(b))**

- 1. The Executive Summary is required. Include the objectives and outcomes identified in the plan and an evaluation of past performance.**

#### Action Plan Executive Summary:

Waukesha County was allocated \$1,334,028 in CDBG funds and \$1,104,785 in HOME funds for FY2014. This grant award represents an increase in funding from 2013. In addition to the grant award, Waukesha County anticipates the receipt of \$565,000 in CDBG program income and \$157,000 in HOME program year from repayment of loans made using funds from each program.

The allocation of the 2014 funds is consistent with the goals and objectives identified in the Five Year Consolidated Plan. Between the CDBG and HOME programs, about \$1,495,902 has been allocated to housing activities, which was identified as the number one priority in the Consolidated Plan. The second highest priority in 2014 is Public Services, which are funded both under the 15% cap regulation and through the funding of Neighborhood Revitalization Strategy Area Public Services. For 2014, Public Services under the 15% cap total \$266,236 or 15% of the grant. In addition, Public Services serving residents of the three HUD approved Neighborhood Revitalization Strategy Areas (NRSA) are funded at \$185,000 or 10% of the 2014 allocation.

Economic Development is another high priority for the CDBG program. Waukesha County's Economic Development program is operated as a revolving loan fund, administered by the Waukesha County Economic Development Corporation (WCEDC). This RLF has been in existence for a number of years and returns program income in excess of \$350,000 each year. This program income is the primary source of funding for economic development. In 2014, the CDBG Board granted WCEDC \$450,000 in program income for economic development, which is 25% of the total 2014 CDBG allocation.

Another priority for Waukesha County is Public Facilities; many of the participating jurisdictions in the County continue to fund activities which meet the Americans with Disabilities Act compliance requirements for increasing accessibility through this category. These projects are approved under the presumed benefit. Finally, the allocation includes activities related to removal of spot slum and blight related to business improvements to properties in blighted conditions as identified by local action and historic preservation to improve/maintain historic properties. For 2014 approximately 10% of the total CDBG funding, or \$180,691 has been allocated to Public Facilities projects.

The grant also provides an Administrative cap of 20% for administration, planning and Fair Housing. The allocation for Administration is less than the 20% cap including the allocation for Fair Housing.

The HOME Program allocation is very similar to past years. 15% of the grant is set aside for the CHDO reserve (\$165,718), 10% is used for Administration, and most of the rest of the funding is allocated to the three core programs, Downpayment Assistance (\$300,000), Homeowner Rehabilitation (\$225,000), and Purchase/Rehabilitation (\$175,000). \$128,000 was left unallocated and will be used either for funding a housing development project or to supplement the core programs during 2014.

## **Action Plan Required Elements:**

### **Geographic Distribution/Allocation Priorities:**

2. Describe the geographic areas of the jurisdiction (including areas of low-income families and/or racial/minority concentration) in which assistance will be directed during the next year.

\*Please note that maps or other attachments may be included as additional files within the CPMP Tool.

#### **Action Plan Geographic Distribution/Allocation response:**

The Waukesha County CDBG program serves the entire county including the City of Waukesha, which has waived its entitlement status to participate in the urban County CDBG program. The CDBG program does exclude two municipalities: Village of Chenequa and Oconomowoc Lake.

The HOME Consortium is a four county consortium (Jefferson, Washington, Ozaukee and Waukesha) with Waukesha County serving as the Participating Jurisdiction (PJ) for grant purposes. Only four municipalities in the four counties do not participate in the HOME program (Sullivan in Jefferson County, Chenequa and Oconomowoc Lake in Waukesha County and Bayside in Ozaukee County). The allocation of CDBG and HOME funds is determined by applications received from agencies for CDBG funds or from households/developers seeking HOME funds.

Waukesha County has three HUD approved Neighborhood Revitalization Strategy Areas (NRSA) located in the City of Waukesha with a minimum of 51% low and moderate income residents. CDBG funds in the amount of \$185,000 are concentrated in these three NRSA areas to serve low and moderate income persons and provide coordinated services to those areas. The three NRSA areas have a higher percentage of Hispanic residents than most areas of the county, but no concentrated racial population.

As an Urban County, municipalities and/or areas may qualify for low and moderate income (LMI) status if they exceed the highest quartile of LMI in the county, which is 32.4%. Four of the 35 municipalities exceed the 32.5% LMI quartile. They are: the Village of Butler at 45.6%, the Village of Dousman at 40.39%, the Village of Lannon at 41.96% and the City of Waukesha 34.2%. No specific funding consideration has been given to these areas of LMI concentration.

3. Describe the reasons for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA) (91.215(a)(1)) during the next year and the rationale for assigning the priorities.

Action Plan Geographic Distribution/Allocation response:

Waukesha County allocates investments geographically within three approved NRSA areas based on priorities established by the CDBG and HOME Board respectively. Waukesha County has been consistent for the past twelve years in its priorities, although funding has not always followed the priorities. Since the formation of the HOME Consortium, a majority of the housing allocation has been covered through the HOME program. The Economic Development allocation has been determined by the amount of program income available for loans and the number of new loans approved.

Since the formation and HUD approval of the NRSAs in 1998, the focus of the CDBG allocation has shifted to assistance directed at those three NRSA areas. Funding for agencies providing services in the NRSAs is about 10% of the total CDBG allocation for 2014.

4. Describe actions that will take place during the next year to address obstacles to meeting underserved needs.

Action Plan Geographic Distribution/Allocation response:

In 2012, Waukesha County hired a consultant group to analyze the CDBG program including the application, ranking and allocation process. Based on the results of this study, we revised our application process for 2013, placing an emphasis on awarding points to agencies and programs that work to address the top priorities in the Consolidated Plan. We believe this focused funding on the highest priority needs in the community, many of which are currently underserved. We continued to revise and refine this process for the 2014 application.

For most CDBG/HOME funding, Waukesha County considers the funding as gap or leverage funding to assist in project implementations. Based on the Five Year Consolidated Plan and focus groups and comments received at public hearings, Waukesha County attempts to respond to identified needs. The County collaborates with United Way and local foundations to identify both obstacles and needs. Waukesha County staff attend the monthly meetings held by the Waukesha County Housing Action Coalition. The current economic national problems have placed an extraordinary burden on agencies serving low and moderate income households. Waukesha County will partner with non-profit agencies to identify underserved needs and discuss solutions which may or may not include CDBG funds. Future CDBG funds will need to consider those underserved identified needs.

**Sources of Funds:**

5. Identify the federal, state, and local resources the jurisdiction expects to receive to address the needs identified in the plan. **Federal resources should include Section 8 funds made available to the jurisdiction, Low-Income Housing Tax Credits, and competitive McKinney-Vento Homeless Assistance Act funds expected to be available to address priority needs and specific objectives identified in the strategic plan. (92.220(c)(1))**

Action Plan Sources of Funds response:

Waukesha County contracts with the City of Waukesha Housing Authority to administer the Section 8 program and other housing authority activities. The Waukesha Housing Authority reports that due to the lack of a full appropriation of federal funds, the Housing Authority is unable to determine the 2014 allocation for Section 8 Vouchers or Public Housing as of this writing.

Low Income Housing Tax Credit (LIHTC) application for 2014 were due to the Wisconsin Housing and Economic Development Authority (WHEDA) by February 1, 2014. Waukesha County has committed \$340,000 in HOME CHDO funding to one of these potential projects, but will not know if the project is awarded LIHTCs until the end of April 2014.

Waukesha County does not directly receive McKinney-Vento Homeless Assistance Act funds. The Waukesha County Continuum of Care, which includes a consortium of

agencies, receives ETH Homeless funds: A/K/A Emergency Solutions Grant. Funding is provided for a July 1, 2013 to June 30, 2014 period from the State. A total of \$62,787 in Emergency Shelter Grant (ESG) funds were provided to seven agencies, \$70,277 in Homeless Prevention Program (HPP) funds were provided to two agencies and \$54,994 in Rapid Re-housing funds was provided to one agency.

Any additional sources of funds are unknown at this time.

**6. If you plan to dedicate funds within a local targeted area, provide the boundaries of the targeted area and an estimate of the percentage of funds you plan to dedicate to target area(s). (91.220(f))**

Action Plan Sources of Funds response:

Waukesha County will not target funds to any particular areas with the exception of three Neighborhood Revitalization Areas, which will be addressed in #7 below.

**7. If your plan includes a Neighborhood Revitalization Strategy Area or Areas, please identify the census tracts for each NRSA and an estimate of the percentage of funds you plan to dedicate to the NRSA(s).**

Action Plan Sources of Funds response:

Waukesha County has in place three Neighborhood Revitalization Strategy Areas (NRSA) covering the following census tract/block areas by NRSA areas.

<b>NRSA Neighborhood</b>	<b>Census Tracts</b>	<b>Block #'s</b>
Phoenix Heights	202,700	1
	202,800	4
Haertel Field	202,700	2
	202,302	3
Westside	203,102	2 and 3
	203,103	4

Waukesha County allocated 2014 CDBG funds to fourteen agencies to provide specific services to NRSA residents with a total funding of \$185,000, which represents 10% of the 2013 CDBG allocation.

**8. Explain how federal funds will leverage resources from private and non-federal public sources.**

Action Plan Sources of Funds response:

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Each CDBG application requires the applicant to identify other resources either public or private, which are leveraged against the CDBG funds to fund the proposed activity. Both CDBG and HOME funds provide gap financing for activities (with the exception of housing rehabilitation, which may be the only source of funds) with beneficiaries intended to meet at least the percentage of CDBG/HOME funds to the entire activity budget. The leverage ratio of CDBG/HOME funds to the total project budget is as low as 1:5 to as high as 1:125 depending on the CDBG/HOME allocation and the entire project budget.

**9. Provide a description of how matching requirements of HUD's programs will be satisfied.**

Action Plan Sources of Funds response:

There is not a match requirement for CDBG funding although all funded activities are matched with some public or private funds. The HOME match is met through Tax Incremental Financing revenue placed into a housing rehabilitation account; volunteer hours worked on Habitat projects, donated materials or municipal contributions, and are documented in the following year CAPER.

**10. If the jurisdiction deems it appropriate, indicate publicly owned land or property located within the jurisdiction that may be used to carry out the plan.**

Action Plan Sources of Funds response:

At this time, no publicly owned land has been identified for program use.

## **Managing the Process**

**11. Identify the significant aspects of the process, by which the plan was developed, and the agencies, groups, organizations, and others who participated in the process.**

In 2009, Waukesha County undertook a detailed process to include agencies both public and private, citizens and other interested parties in establishing priorities, obtaining comments on the CDBG and HOME process and recommendations for program modifications. The findings of the 2009 public focus groups played a considerable role in determining the priorities of the 2010—2014 Consolidated Plan, and have been used in the priority and allocation process for funding in 2010, 2011, 2012, 2013 and 2014.

The focus groups were coordinated by independent consultants to ensure impartiality in participants' comments. The focus group comments were summarized and presented to both the CDBG and HOME Boards for considerations during their oversight of the program process.

Action Plan Managing the Process response:

The CDBG and HOME programs are governed by appointed Board of Directors who make funding recommendations for approval by the Waukesha County Board of Supervisors, as the grantee. The CDBG Board established a timeframe for acceptance of applications (March 1 – April 1, 2013) for the 2014 applications. After receipt and determination of application eligibility by the staff, the Board scheduled presentations from the applicants in May. After hearing the presentations, the Board members scored each application using a 100 point scoring system. When all presentations were heard and scores transmitted, the applications were ranked from highest to lowest based on the Board member scores. A preliminary allocation was developed by staff and modified by the CDBG Board before a Public Comment publication was advertised in the official County newspaper. A public hearing was held on July 10, 2013 (see citizen participation comments). The recommended allocation was presented by ordinance to the County Board, and approved on August 27, 2013. The County Executive approves the ordinance and executes the grant agreement with HUD.

12. Describe actions that will take place during the next year to enhance coordination between public and private housing, health, and social service agencies.

Action Plan Managing the Process response:

Waukesha County hired a consultant to study the CDBG process and make modifications to the 2013 application process. Specifically, the County wanted to evaluate funding decisions in the first two years of the current Consolidated Plan (2010-2014) compared to the priorities set in the Plan. The evaluation process led to an adjustment in the 2013 grant application form to more clearly articulate the funding priorities of the Consolidated Plan and present recommended changes to the application scoring criteria to also reflect the Plan priorities. Besides considering the comments received during the Consolidated Planning focus groups, the CDBG Board also receives transcripts from the Department of Health and Human Services public hearings, the Aging and Disabilities public hearings and the United Way allocations when reviewing the CDBG applications, scoring and allocations.

In 2014, Waukesha County will continue outreach to public/private developers to encourage affordable housing developments, providing gap financing for Tax Credit applications and encouraging workforce housing near employment centers. The HOME Board will continue to monitor funded activities to determine demand for each activity and adjust funding to meet demand.



The CDBG Board will continue to coordinate with United Way, the county departments of Health and Human Services, Aging and Disability Resource Center and discussions with social service agencies to obtain additional information on community needs to refine the Consolidated Plan.

## Citizen Participation (91.220(b))

**13. Provide a description of the process used to allow citizens to review and submit comments on the proposed consolidated annual plan, including how the plan (or a summary of the plan) was published for review; the dates, times and locations of a public hearing, or hearings; when and how notice was provided to citizens of the hearing(s); the dates of the 30 day citizen comment period, and if technical assistance was provided to groups developing proposals for funding assistance under the consolidated plan and how this assistance was provided.**

### Action Plan Citizen Participation response:

The Consolidated Plan was developed for the period from 2010-2014. The Citizen Participation process including focus group participation was described in detail in the Five Year Consolidated Plan. A joint (HOME/CDBG) funded consultant, Community Planning and Development Advisors (CPDA), was hired to coordinate the citizen participation process. A series of six focus groups were held by consultants and the comments were forwarded for consideration to the HOME and CDBG Boards.

On July 10, 2013, Waukesha County held a public hearing to obtain public comments relating to community needs and funding priorities for the year 2014 annual allocation plan. Community Development staff formally outreached to all previously funded agencies to receive additional feedback. This notice provided a 30-day comment period. The hearing notice was also posted on the new community development website and published in the local paper. No individuals attended the public hearing or sent any comments to the Community Development Division during the 30-day comment period.

Waukesha County completed a draft of the Annual Action Plan narrative and posted the Plan for citizen comments on the County website, published the notice in the local paper and informed subgrantees that it had been posted. The thirty day comment period was held from October 1 to October 31, 2013. A public hearing was held on October 9, 2013. No public comments were received.

Waukesha County both funds La Casa de Esperanza and works with the agency to provide bi-lingual outreach. The County posts all advertisements in the newspaper of general circulation and the County website and utilizes its contacted agencies to provide additional minority outreach.



## Consultation

Waukesha County, as the lead agent and federal fund grantee, shall have primary responsibility for the development and implementation of this plan.

Waukesha County is the designated lead agent in the HOME Investment Partnership (HOME) Program, a collaborative, cooperative program including the counties of Waukesha, Washington, Jefferson and Ozaukee counties and 97 of 101 current municipal jurisdiction participants.

Together with community leaders, municipal government representatives and local advocates for community development, housing and homeless issues, the County worked to develop a set of priority needs, in addition to specific goals and objectives, for related programming from 2010-2014.

In an effort to increase public involvement in the development of the 2010-2014 Five-Year Consolidated Plan, Waukesha County contracted with the consultant firms of Urban Strategies, LLC and Community Planning and Development Advisors, LLC to conduct a series of focus groups for stakeholders and practitioners involved with CDBG and the HOME program and to conduct an Internet survey of community members.

## Focus Groups

The intent of the County was to provide a forum for participation by key community leaders, or stakeholders, from each of the four counties involved in the Consolidated Planning process; Jefferson, Ozaukee, Washington and Waukesha counties. An invitation to participate in the process was sent to people from each respective county who represented a variety of special interest groups, elected officials, public administrators, police and fire departments, and non-profit organizations. The focal point for sessions held in the HOME Consortium counties of Jefferson, Ozaukee and Washington County was on housing issues, given that HOME funding is exclusively for housing activities. Two sessions held in Waukesha County focused on both community development and housing issues since the County receives both CDBG and HOME funding. An additional session was held in Waukesha County, open to participants from all counties, to specifically cover fair housing issues. ***The comments and statements included below are solely of the participants in the focus groups and do not represent the opinions or policies of the Waukesha County Consortium***

The series of focus group sessions were held on the following dates:

- October 8, 2009 in Jefferson County, focused on Housing issues.
- October 14, 2009 in Ozaukee County, focused on Housing issues.
- October 21, 2009 in Washington County, focused on Housing issues.
- October 26, 2009 in Waukesha County, (an evening session) focused on both Community Development and Housing issues.

- October 28, 2009 in Waukesha County (2 sessions: am and pm), focused on both Community Development and Housing issues.
- November 4, 2009 in Waukesha County, focused on Fair Housing issues

At each of the sessions, the participants were divided into groups of 10 or less. Facilitators from Urban Strategies/Community Planning and Development Advisors used a nominal group technique developed by Andre Delbecq to help each group generate a series of responses to a question, clarify and consolidate the ideas, and then rank them. This was repeated for each of two or three topic questions to provide County staff and the consultants with enriched observations about the strengths, weaknesses and balancing efforts of the community development and housing programs.

### **Jefferson/Ozaukee/Washington County Housing Focus Groups**

The three questions asked at the housing-only sessions, one each in Jefferson, Ozaukee, and Washington Counties, were:

- What are the strengths of housing programs funded over the last 5 years in Jefferson/Washington/Ozaukee County under the Waukesha County Consortium Consolidated Plan?
- What are the weaknesses of housing programs funded over the last 5 years in Jefferson/Washington/Ozaukee County under the Waukesha County Consortium Consolidated Plan?
- What should be the priorities or focus of housing programs in the 2010 – 2014 Waukesha County Consolidated Plan for Jefferson/ Washington/Ozaukee County under the HOME program?

#### Summary Narrative

***Following is a summary of the strengths and weaknesses and recommendations for future funding offered at the three 3 focus group sessions held in Jefferson, Ozaukee, and Washington Counties. These statements were compiled by the consultants, Community Planning and Development Advisors (CPDA). The following were observations and opinions of the participants in the focus groups. They have not been verified and are not presented as factually accurate. The statements provided below do not represent the opinions or policies of Waukesha County or the Waukesha County Consortium.***

Among the strengths mentioned by the groups were the following: there is a fairly good amount of housing available for seniors and the disabled and the quality of the housing stock is good; there is a variety of housing available; the old county by county allocation process was much more fair and useable for them and they would

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like to return to that process; there is minimal duplication of services within the counties; a housing hotline that refers people to available resources; the shared ride program offers improved transportation; agencies are very dedicated, sustainable and long term.

Among the weaknesses mentioned by the groups were the following: what is most needed is more affordable housing for people on SSI; need for more communication and education; the canceling a program in mid-year; need a landlord association in each county; there should be a percentage of the HOME allocation that has local control; there is a need for more transitional housing.

Many recommendations were made for what the focus and priorities should be over the next five years. Among these were: improve communication with seniors, disabled and caregivers on what is needed to keep people in their homes, including housing needs; provide technical assistance to individual organizations on how to access and use available funds; provide permanent housing with case management; continue assistance for purchasing homes; return to the old allocation system of providing each county with funding; change the administration of the program from Waukesha County being the lead agency to hiring an independent entity through a contractual arrangement; increase the allotment for Tenant-Based Rental Assistance and increase local control of that activity; provide grant writing assistance to organizations; work on legislation to reduce regulatory barriers to affordable, multi-family housing; provide education on job training for youth in housing rehab trades; re-evaluate the HOME Board composition and membership rules to allow for rotating terms, or 1/3, 1/3, 1/3 system; and better recognition of shared priorities.

### **Waukesha County Housing and Community Development Focus Groups**

The three questions asked at each of the three community development and housing sessions in Waukesha County were:

- What are the strengths of the current 5-Year Waukesha County Consolidated Plan or the community development and housing programs?
- What are the weaknesses of the current 5-Year Waukesha County Consolidated Plan or the community development and housing programs?
- What should be the priorities or focus of in the 2010 – 2014 Waukesha County Consolidated Plan for community development and housing programs?

Summary Narrative

***Following is a summary of the strengths and weaknesses and recommendations for future funding offered at the three 3 focus group sessions held for Waukesha County. These statements were compiled by the consultants, Community Planning and Development Advisors. The***

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***following were observations and opinions of the participants in the focus groups. They have not been verified and are not presented as factually accurate. The statements provided below do not represent the opinions or policies of Waukesha County or the Waukesha County Consortium.***

#### Strengths

The highest rated strengths concerned the CDBG/HOME boards and the process of making funding decisions. Participants complimented the board for its diversity, knowledge and fairness in project selection. It was noted that the board process is open, asks good questions and are encouraging. Participants also complimented the application process which they said was simple.

There were also compliments for the County staff for being available, helpful and knowledgeable.

Programmatically, practitioners noted that the County funds “critical basic needs” programs such as social services and assists non-profits by funding programs and operations. Funding was described as diverse and flexible.

#### Weaknesses

The most pronounced weakness in the community development in Waukesha is the lack of affordable housing. The participants noted a lack of mixed affordable housing outside of the city of Waukesha and they specifically mentioned rental and housing for the disabled.

The second cluster of comments about weaknesses in the program concerned the distribution of funds and the amount of available funds. The highest rated weakness was that CDBG is providing funding for government entities as well as other organizations that also provide funding. Although the groups knew that total funding for CDBG and HOME is based on a mathematical formula, participants still noted that the county tries to spread its funding too much. Two types of funding distribution methods were criticized. One was the decision not to fully fund projects so that the available funds can be further spread. This method was called “slow death.” Another funding method criticized was the county’s policy of not funding “duplicative” programs. A participant noted that “There is a lack of understanding of what constitutes “duplication” of services.

#### Recommendations for Priorities

In analyzing the focus group sessions the consultants identified three major themes. The first and the one that garnered the most comments involved the County’s process of making funding decisions. Recommendations included more funding for non-profits and more focus on community needs. Make sure that the programs selected match the needs. The group also recommended training and educational

sessions for the board, the public as well as non-profits participating in the program. A two year grant was suggested. The group also recommended elimination of what they called "second level funding" including funding agencies that then turn around and fund other agencies.

The second theme was affordable housing. More housing was called for as was mixed income housing, and affordable housing in areas outside of the City of Waukesha. Comments also addressed increasing county resources for housing and educating the public about the housing trust fund and its benefits.

The third category of recommendations included specific programs including mental health and two recommendations for transportation.

### **Waukesha/Jefferson/Ozaukee/Washington Fair Housing Focus Groups**

The two questions asked at the one Fair Housing focus group session held in Waukesha County were:

- What are the strengths (S) and weaknesses (W) of the Fair Housing programs within Waukesha County and within the participating jurisdictions of the Waukesha County Consortium?
- What should the focus be or what actions should be taken over the five years to address Fair Housing issues in Waukesha County and the participating jurisdictions within the Waukesha County Consortium?

#### Summary Narrative

***The following strengths and weaknesses were recorded observations and opinions of the participants in the focus groups. They were recorded by and analyzed by the consultants, CPDA. As previously noted these observations and opinions do not represent the opinions or policies of the Waukesha County Consortium nor are they to be considered as verified and factually accurate.***

#### Strengths

Very few strong points were listed by the groups with one group listing only three strengths and the other two groups listing five each.

The one strength listed by all three groups was the County's down payment assistance and homeownership program. Two groups listed the two advocacy groups supporting affordable housing in the county as strengths, the Housing Trust Fund and SOPHIA. Related to this, the one group that did not specify these groups did say that the county does work with community groups which may include these advocacy groups.

Two groups did compliment the CDBG/HOME program administrators saying that they are knowledgeable and helpful.

#### Weaknesses

The list of weaknesses is long. Two groups listed 17 weaknesses and the one remaining group listed 14. Many of the comments were made by one individual and were not duplicative.

If categorized, the most frequently mentioned weakness related to a lack of political will and commitment to affordable housing and fair housing on behalf of local elected officials. Lack of commitment to the plan and implementation of fair housing by the private sector was also identified as a weakness.

It was noted by a number of participants that racial segregation continues to be an issue and this is not identified in the analysis of impediments nor acknowledged. It was suggested that instances of discrimination is “understated” particularly because the minority population is so small that using grievances as an indicator is not an accurate measure.

Another commenter broadened that idea to suggest the Plan identify the changing characteristics of the lower income population in Waukesha County.

A number of participants noted that the public lacks knowledge about fair housing and affordable housing and there is a need for public education.

The cost of land was identified by a number of participants as a major impediment to affordable and fair housing. It was noted that the cost of land continues to increase as suitable, available sites are developed for other uses such as commercial development or market rate housing. Related to this were comments concerning the potential restrictive effects of zoning which could contribute to the high cost of land. Also related was a comment that since Waukesha County doesn’t have the authority to implement provisions of the Comprehensive Development Plan in municipalities, this is a weakness inhibiting fair housing.

When discussing specifics of the Analysis of Impediments, Consolidated Plan and implementation of the CDBG and HOME programs, the participants noted a number of weaknesses. These included:

- There is no mention of Affirmative Fair Housing Marketing in the Analysis of Impediments.
- The plan does not create affordable housing. The plan does not promote affordable rental housing.

- There is too much emphasis on homeownership. This means that assistance is offered to moderate income households at the 50 – 89 percent of median income range but not available or affordable to those below 50 percent of county median.
- Housing plans are for senior housing not integrated or mixed housing.

Each group also identified as a major weakness a prohibition that prevents the Waukesha Housing Authority from developing affordable housing outside of the City of Waukesha.

The lack of jobs, workforce housing and transportation were also weaknesses mentioned and agreed to by many participants.

### **Recommended Priorities/Goals for Fair Housing**

Each of the three groups recommended support for a Housing Trust fund, improving the transportation system and linking jobs/employment to affordable housing as major priorities for the future. Workforce housing was mentioned a number of times and it was suggested that the county develop incentives to encourage employers to participate in programs for workforce housing.

Another major recommendation was that the County/Consortium must change the emphasis of the funding from homeowner to a more diversified mix of housing, especially multifamily housing. One comment was that the county must “stop the funding disparity.” Related to this were a number of other recommendations.

- Consolidate multiple funding sources to allow financing of larger projects.
- Better coordinate funding sources to align support services with housing development.
- Encourage bigger developments to help qualify for use of tax credits.
- Develop a new CHDO (Community Housing Development Organization) capable of developing affordable housing.

The groups also suggested continuing the education of public officials and the public at large about the benefits of affordable and fair housing. Among the suggestions were:

- Educate and encourage advocacy to the general public;
- Compile examples of good housing programs in other counties. Publicize and promote the benefits of affordable housing
- 
- Make presentations to communities; make use of media.



- Develop a best practices inventory and other concepts.
- Identify champions in each municipality to attend meetings, voice the need for affordable housing.
- Identify and fund projects that meet goals of the plan.
- Gear education on benefits to local elected officials.
- Work with development community to highly publicize a good project i.e. concept houses.
- Change the “culture of exclusion” especially with elected officials.

Other recommendations included:

- Changing zoning to streamline the system and encourage multifamily housing.
- Find methods to hold local governments accountable for enforcement of the Consolidated Plan’s Certification to Affirmatively Further Fair Housing.
- Create a County Fair Housing Ordinance.
- Acquire foreclosed and abandoned properties to use for affordable housing.

See a summary of the results of focus groups in Appendix B.

### **Community Needs Survey**

A copy of the survey, charts of survey results and written comments from the survey are provided in Appendix B.

The Internet Community Needs and Housing Needs Survey was conducted during the months of September and October 2009 and was accessible to residents of Jefferson, Ozaukee, Washington and Waukesha counties through the Waukesha County’s and Waukesha City’s website. The results of the needs survey were to help the County determine the use of public funds, including their yearly allocations of Community Development Block Grant funds, HOME funds and programs introduced under the economic stimulus package.

Five hundred and four (504) residents of the four Consortium Counties accessed the survey with 89.9% (453) of those responding completing the entire survey. The respondents represented residents of each of the counties in the Consortium by the following percentages: Jefferson County (26.5%), Ozaukee County (1%),

Washington County (3.4%), and Waukesha County (69.1%). The survey included questions concerning community development and housing for residents of Waukesha County, but the questions for residents of Jefferson, Ozaukee and Washington counties focused on housing activities.

### **Waukesha County Questions and Results:**

Two of the questions asked Waukesha's residents about their feeling regarding neighborhood safety. In response to the question that asked about the residents "feeling about neighborhood safety," 43.4% said that "they always feel safe", 53.8% said that "they mostly feel safe", 3.1% said "mostly feel unsafe" and no one said that they "never feel safe". The follow up question was whether their feeling of safety had changed in the last 5 years. 10.6% said "they feel a lot safer", 31% said "they feel somewhat safer", 57% said "they feel somewhat less safe", and 2.1% said "they feel a lot less safe".

In regard to housing, the survey asked two questions of Waukesha County residents. First, the survey asked the residents to rate the Need for housing programs/assistance in their neighborhood. The rating scale used was 1 = Extreme Need to 4 = No Need at all. The highest ratings were in the 3 to 4 range indicating No Need to No Need at All. This indicated that residents did not believe that housing assistance was needed. Of those who did rate housing as needed, "places that are safe after dark", "places to walk" and "places for children to play" received the highest ratings. Rental housing was rated the highest under No Need At All.

The survey then asked Waukesha County residents to rate the importance of spending public dollars on various activities relating to housing, economic development, public improvements, revitalization efforts, homeless programs and public services. The ratings choices were Extremely Important, Very Important, Not Very Important, Not Important, or Don't Know. The activities were selected for inclusion in the survey based on a review of funding decisions made by the County in allocating Community Development Block Grant (CDBG) and HOME funds over the last 10 years.

The second housing question on the survey asked the residents to "rate the importance of spending public dollars on housing efforts." "Housing for persons with disabilities" and "housing for seniors" were the two categories with the highest scores of Extremely Important and Very Important. A rating of Very Important" was selected most often by respondents for all but two of the activities listed: affordable housing development (36.4%), owner housing development (39.2%), down payment and closing costs (40%), housing for seniors (53.7%), housing for persons with disabilities (53.3%), homeowner rehab loans (41%), and fair housing activities (35%). The highest rating of Not Very Important was given to the two remaining activities of "rental housing development" (36.6%) and "rental rehab loans" (36%).

In the economic development/public improvement category, both “increasing the opportunity for jobs” and “encourage the development of small businesses” were rated extremely important/very important by 90.6% of those responding. Repair/replace streets and street lighting was next highest rated at 86.3%. Also highly rated was to “remove/repair/replace blighted and damaged buildings” at 70.6%, followed by “repair/improve targeted public facilities” with 68.2% considering that category extremely important/ very important. Lowest scoring categories were “improve/ increase the number of bus shelters/stops” with 62.2% of those responding putting this in the not very important/not important categories and 55.4% of the respondents ranking not very important/not important for “improving the conditions of parks and public space”.

In the category for homeless and public service programs the choices all received fairly high levels of support in the categories of extremely important and very important. The highest in importance (rated extremely important/ very important) were “programs that assisted disabled persons” at 83.1 and job training programs at 82.4%. “Programs that assist senior citizens” were rated extremely important/very important by 81.3% and that was closely followed by “programs for youth” at 80.6%. 76.2 % of the respondents rated “programs that serve persons with mental illness” as extremely important/very important. At the low end, “legal services” was deemed not very important/not important by 48.8% of those responding followed by 42.3% for the category of “facility improvements for non-profits”.

The survey also asked Waukesha County residents “generally speaking, how has your City/Town/Village changed in the following areas over the last 5 years?” The choices were “A Lot Better Off”, “Somewhat Better Off,” Somewhat Worse Off,” “A lot Worse Off,” and “Don’t know. Over 50% of the respondents rated their communities as “A Lot Better Off” in the following categories:

- Opportunities for walking (57.8%)
- Opportunities for biking (55.8%)
- Condition of parks and other public spaces (52.9%)
- General neighborhood appearance (51%)
- Safe places for children to play (50.9%)

On the opposite side, 22.7% of the respondents reported that Opportunities for Jobs was “A Lot Worse Off,” the highest rating in that category. If you combine this with those who rated this category “Somewhat Worse Off” (35.3%) the total was 58% of the respondents. This was the highest of the negative ratings followed by 45.1% who found the conditions of the streets and sidewalks worse off and 42.8% who the situation was worse off regarding affordable housing than it was five years ago.

What is interesting is the high number of respondents who did not know whether certain categories were better or worse off. However, three of the four highest rated as “do not knows” were in regard to housing, particularly for rental, the disabled and seniors. This included:

- Availability of housing for people with disabilities (50.3%).
- Availability of housing for seniors (41.8%).
- Public transportation options (34.7%).
- Availability of rental housing (33%).

### **Jefferson, Ozaukee and Washington Counties**

Residents of Jefferson, Ozaukee and Washington Counties receive only HOME funding from the Waukesha County Consortium. Therefore, this survey only asked one program question relating to housing for each county. The question was: “...please rate the importance of spending public dollars on housing efforts in your county in the following areas.” A list then was provided of various housing program types and the respondents scored each according to a scale ranging from Extremely Important to Not Important. They were also given the opportunity to check Don’t Know.

Jefferson County: 132 respondents

The category of housing that received the highest percent response as Extremely Important was “Affordable Housing” at 52.7%. Combining that with those who responded that “Affordable Housing” was Very Important gave this category a rating of 86%. The second highest rated as Extremely Important was “Homeownership Assistance” at 47.5% although when combined with Very Important this activity rated fourth at 76.2%. “Rental Housing” was rated third as Extremely Important at 42.3% and third combined at 76.9%. Interestingly, the second highest combined score was for Fair Housing Information and education activities with a combined score of 79.5%.

Jefferson County residents rated “Rental Rehab Loans” and “Rental Housing” as one and two for being Not Very or Not important “scoring them 26.7% and 26.1% respectively.

Washington County: 17 respondents

38.9% of the Washington County respondents scored “Fair Housing Anti-Discrimination Activities” as Extremely Important, the highest score in the housing category. 55.6% scored “Housing Rehab loans” as Very important. Combined, the highest rated category was “Housing for disabled persons” at 77.8%. On the negative side, 44.4% of the respondents rated “Rental Rehab Loans” as Not Very Important.

Ozaukee County: 5 respondents

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The highest rated category in Ozaukee County was “Owner Housing Development” with 66.7% of the respondents rating that as Extremely Important. “Affordable housing” was second at 33.3%. 66.7% of respondents said that “Homeowner Rehab Loans” was Not Very Important.

The survey allowed for written comments to each question and there was one open-ended question for each county inviting a respondent to provide any additional comments or recommendations on the use of public funds over the next 5 years. The respondents to the survey were more than willing to provide their recommendations with comments. (See Appendix B)

***Based upon the survey responses, the consultants, CPDA, have categorized the following conclusions for consideration by staff and County officials:***

**Economic Development and Public Facilities Components** (Question 12)

Conclusion # 1:

Waukesha County survey respondents indicated a preference that CDBG funding should be provided to activities that increase opportunities for jobs.

Conclusion # 2:

Additionally, survey participants supported using federal funds to encourage the development of small businesses.

**Homeless and Public Service Components** (Question 13)

Conclusion # 1:

Waukesha County survey participants favor funding programs that assist people with disabilities.

Conclusion # 2:

Waukesha County survey participants also favor funding job creation activities under public services.

**Housing Components**

**Waukesha County:** (Question 14)

Conclusion # 1:

Less than 25% of Waukesha County respondents scored housing as an extremely important need in any housing category. The highest rated need was for “affordable owner-housing development”, but, at the same time, a higher number of people rated “affordable rental housing” as being of little or no need. “Rental housing” was seen by the largest percent of people responding as being Not Very Important or Not Important with a combined score of almost 50%.

Conclusion # 2:

If CDBG and/or HOME are used for housing activities, the activity that more than 50% of survey participants rated as most important was “housing for persons with disabilities” followed by “housing for seniors”.

**Jefferson County:** (Question 18)

Conclusion # 1:

Jefferson County survey participants favor funding of “affordable housing” activities.

Conclusion # 2:

Jefferson County survey participants favor funding of “homeownership assistance” activities.

Conclusion # 3:

Jefferson County survey participants favor encouraging Fair Housing information and education activities as well as Fair Housing anti discrimination activities.

**Ozaukee County:** (Question 21)

Conclusion # 1:

Ozaukee County survey participants favor funding for “owner housing development” programs.

**Washington County:** (Question 24)

Conclusion # 1:

“Housing rehab loans” were rated as very important by Washington County survey participants.

Conclusion # 2:

Fair housing anti-discrimination activities was rated as extremely important by Washington County survey participants.

Conclusion # 3:

Washington County survey participants rated “rental rehab loans” as not very important.

**14. Provide a summary of efforts made to broaden public participation in the development of the consolidated annual plan, including outreach to minorities and non-English speaking persons, as well as persons with disabilities.**

Action Plan Managing the Process response:

Waukesha County provides all citizens an opportunity to participate at all CDBG and HOME Board meetings through a public comment period. All CDBG and HOME meetings are posted in accordance with County requirements for public notice. In addition, two public hearings were held in 2013 to obtain citizen comments on community needs and HOME and CDBG funding priorities. The CDBG Board also reviews comments received at the public hearings held by the Department of Health and Human Services and Department of Senior Services. CDBG staff also receives comments related to various community needs as a participant on numerous coordinating groups, including, but not limited to: Workforce Development Board, Waukesha Action Committee, United Way Community Building Committee, Regional Development Committee, Waukesha Youth Collaborative, and Waukesha Transit Collaborative, etc.

Waukesha County held public hearings to obtain citizen input on community-wide needs, comment on the annual allocation of funds and published all required public announcements.

A public hearing to comment on the 2014 CDBG funding allocation was published as a legal advertisement in the Waukesha Freeman, the official county newspaper, on June 25, 2013. A similar notice relating to the 2013 HOME funding allocation was published as a display advertisement in the Watertown Daily Times, the Ozaukee Press, the West Bend Daily News and the Waukesha Freeman. The public hearing for the proposed 2014 HOME and CDBG allocations was held on July 10, 2013. The Waukesha County Board ordinance approving these allocations was passed on August 27, 2013. No comments were received at the public hearing or during the public notice period.

Waukesha County completed a draft of the 2014 Annual Action Plan and published the notice for the public comment period and public hearing in the Waukesha Freeman. The public comment period ran from October 1 to October 31, 2013. The public hearing was held on October 9, 2013. No public comments were received at the public hearing or during the public notice period. Both the HOME and CDBG Boards approved the Annual Action Plan for 2014. Although Waukesha County's usual submittal date for the Annual Plan in November 15, HUD asked PJs to hold their submittal until the Federal budget passed and an actual HUD allocation was determined. The allocation award for 2014 was received by Waukesha County on April 3, 2014. The award was an increase over what Waukesha County had estimated to receive for 2014 for both HOME and CDBG, although not an increase that would result in a substantial change to either program. The additional funds



were allocated to the “unallocated” sections of each program, to be allocated as applications or projects are received during the year.

The CDBG Board met on April 9, 2014 to approve the revised 2014 Annual Action Plan, and the revised 2014 CDBG Allocation, based on the actual allocation amount. The HOME Board met on April 17, 2014 to approve the revised 2014 Annual Action Plan, and the revised 2014 HOME Allocation, based on the actual allocation amount. The Waukesha County Board will approve the 2014 allocation increase at their next regularly scheduled meeting on May 27, 2014.

15. Provide a summary of citizen comments or views on the annual plan.

Action Plan Managing the Process response:

Waukesha County provides all citizens an opportunity to comment on any aspect of the CDBG/HOME program at each Board meeting. The posted agenda always includes a citizen comment period. Staff also participates on a number of committees where representatives of minority and disabled organizations are represented. The County has an on-going relationship with La Casa de Esperanza who serves the Hispanic population. The President of the Waukesha Chapter of the NAACP sits on the CDBG Board and is consulted on the needs related to the minority population. The County advertises in the official County newspaper and on the County website, which are available to all residents. Most County outreach and need assessment to minorities, non-English speaking persons or persons with disabilities is done through agencies serving these populations who are encouraged to provide comments to the annual Plan, CAPER, needs assessment and other aspects of the CDBG/HOME programs.

The were no citizen comments to the Annual Plan allocation.

16. Provide a written explanation of comments not accepted and the reasons why these comments were not accepted.

\*Please note that Citizen Comments and Responses may be included as additional files within the CPMP Tool.

Action Plan Managing the Process response:

No comments received were deemed unacceptable and no comments for 2014 were not considered in the annual plan process.

## Institutional Structure

17. Describe actions that will take place during the next year to develop institutional structure.

Action Plan Institutional Structure response:

The Waukesha County program has in place a number of institutional structures and staff participates on a number of committees with public/private participation. Waukesha County's staff participates on the Workforce Development Board, United Way Oversight Committee, Waukesha Housing Action Coalition, Thriving Waukesha, and is a member of the Continuum of Care. The HOME administrator, the Wisconsin Partnership for Housing Development, Inc., coordinates homebuyer efforts with lenders through the four county area, with the Board of Realtors and outreach to other regional homebuyer counseling agencies. Staff outreach to developers and WHEDA to determine applications submitted for Low Income Housing Tax Credits to identify possible gap financing opportunities. Staff also receives the minutes from the Dept. of Health and Human Services and Aging and Disabilities public hearings to identify any critical needs in the County.

## Monitoring

**18. Describe actions to be taken that will take place during the next year to monitor your performance in meeting goals and objectives set forth in your Consolidated Plan.**

Action Plan Monitoring response:

Waukesha County executes a contract with each subgrantee which describes the actions to be taken during the program year to meet the goals and objectives in the Consolidated Plan. Each subgrantee provides an interim progress report during the program year and a final report which describes accomplishments for the year. The accomplishments are compared to the Consolidated Plan goals and accomplishments and the contract to determine if goals and accomplishments were met.

Oversight of the CDBG/HOME program occurs internally in a number of ways. The county fiscal staff oversees expenditures, the Director of Parks and Land Use reviews correspondence and policy decisions, and respective CDBG and HOME Program Boards review status reports and policy issues as they are related to meeting goals and objectives.

Waukesha County undertakes a year-end review of its performance to determine changes needed to meet goals and objectives. Timeliness of expenditures has increased substantially, but will continue to be a monitoring priority. Projects not meeting expenditures timelines will be contacted to determine problems and establish expenditure timelines. Staff reviews expenditures monthly and will undertake direct contact with activities behind expenditure goals.

In addition, the County has developed a chart system to ensure details on activities are submitted for review until an activity is completed.

Waukesha County will establish a schedule for on-site monitoring of at least 20% of its subgrantees in the 2014 program year. This on-site monitoring will be in addition to the quarterly and final written reports submitted.

The HOME program, as noted, will be desk reviewed quarterly by staff in addition to monthly expenditure review. Any project not monitored in 2013 will be monitored in 2014.

**19. Describe steps/actions to be taken during the next year to ensure compliance with program requirements, including requirements involving the timeliness of expenditures.**

Action Plan Monitoring response:

Waukesha County has worked hard over the last two years to spend grant funds in a timely manner. In 2013, Waukesha County changed its 23-month expenditure requirement to a 12-month expenditure requirement. CDBG program Staff prepares a monthly Status Report to monitor expenditures to meet the timeliness requirements and follows-up on activities not spending funds.

**20. Describe steps/action you will use to ensure long-term compliance with housing codes, including actions or on-site inspections you plan to undertake during the program year.**

Action Plan Monitoring response:

The Housing Rehabilitation program has developed a manual which describes the process for loans and enforcement of housing codes. The county through an RFP process has hired State certified housing inspectors to conduct housing inspections in accordance with a code manual approved by HUD.

Waukesha County has in place a rehabilitation standard manual which defines home building codes are to be addressed related to the HOME program. The County contracts will be State licensed contractors to conduct home inspections, which under HOME regulations must be conducted to ensure that all code requirements are met. The inspectors certify that their inspections cover all code requirements. Local inspectors must approve all work requiring a permit to ensure codes are met. The CDBG program requires that work conducted meet code requirements, but unlike the HOME program, the CDBG program does not require that a house be made code compliant.

**21. Describe actions to be taken to monitor subrecipients (including sponsors or administering agents) during the next program year. This includes the monitoring of all programs, CDBG, HOME, ESG, or HOPWA, as applicable.**

Action Plan Monitoring response:

In 2014, Waukesha County will desk monitor all CDBG/HOME subrecipients during the program year. In addition, at least 20% of CDBG subrecipients will be monitored on-site. The HOME program subrecipient, Wisconsin Partnership for Housing Development, will be monitored for compliance in the Downpayment Assistance program.

## Description of Activities

**\*If not using the CPMP Tool:** Complete and submit Table 3C

**\*If using the CPMP Tool:** Complete and submit the Projects Worksheets and the Summaries Table.

**22. The action plan must provide a summary of the eligible programs or activities that will take place during the program year to address the priority needs and specific objectives identified in the strategic plan.**

Action Plan Description of Activities response: **(Use of the Summaries Table and Project Worksheets or Table 3C/2A will be sufficient. No additional narrative is required.)**

Waukesha County will utilize the CPMP tool for information related to activities. Waukesha County will fund 42 activities directly by the county, and 8 activities through an allocation to the City of Waukesha for a total of 50 activities.

The CDBG activities were approved in 7 HUD project categories as follows:

Category	# of Activities	Amount	Percentage
Housing	3	\$ 280,000	15%
Public Services	25	\$ 266,236	14%
NRSA	16	\$ 180,000	10%
Public Facilities	7	\$ 180,691	10%
Economic Development	1	\$ 450,000	23%
Administration	5	\$ 316,600++	17%
Unallocated		\$ 225,501	11%
		\$1,899,028*	100%

\*includes anticipated program income of \$565,000 for 2014.

++includes anticipated program income administration of \$40,000 for 2014

Following is the summary of the 2014 HOME allocation:

Category	Amount	Percentage
Administration	\$ 110,478	10%
CHDO Reserve	\$ 165,718	15%
Housing Rehab.	\$ 225,000	20%
DPA	\$ 300,000	27%
Purchase/Rehab.	\$ 175,000	16%
Unallocated	\$ 128,589	12%
TOTAL:	\$1,104,785*	100%

\*does not include anticipated program income of \$157,000 for 2014

## Summary of Specific Annual Objectives and Outcome Measures

**\*If not using the CPMP Tool:** Complete and submit Table 2C and Table 3A.

**\*If using the CPMP Tool:** Complete and submit the Summary of Specific Annual Objectives Worksheets or Summaries.xls

23. Provide a summary of specific objectives that will be addressed during the program year. (91.220(c)(3))

Action Plan Summary of Specific Annual Objectives response:

**(Use of the Summaries Table and Project Worksheets or Table 3C/2A will be sufficient. No additional narrative is required.)**

See summary Tables 3C/2A

24. Describe the Federal Resources, and private and non-Federal public resources expected to be available to address priority needs and specific objectives during the program year.

Action Plan Summary of Specific Annual Objectives response:  
**(Use of the Summaries Table and Project Worksheets or Table 3C/2A will be sufficient. No additional narrative is required.)**

See summary Tables 3C/2A

**25. Describe the outcome measures for activities in accordance with Federal Register Notice dated March 7, 2006, i.e., general objective category (decent housing, suitable living environment, economic opportunity) and general outcome category (availability/accessibility, affordability, sustainability). 91.220(e)**

Action Plan Summary of Objectives/Outcomes response: **(Use of the Summaries Table or Table 2C/Table 3A will be sufficient. No additional narrative is required.)**

See summary Tables 2C/3A

## HOUSING

### Annual Affordable Housing Goals (91.220(g))

**\*If not using the CPMP Tool:** Complete and submit Table 3B Annual Housing Completion Goals.

**\*If using the CPMP Tool:** Complete and submit the Table 3B Annual Housing Completion Goals.

**26. Describe the one-year goals for the number of homeless, non-homeless, and special-needs households to be provided affordable housing using funds made available to the jurisdiction and one-year goals for the number of households to be provided affordable housing through activities that provide rental assistance, production of new units, rehabilitation of existing units, or acquisition of existing units using funds made available to the jurisdiction. The term affordable housing shall be defined in 24 CFR 92.252 for rental housing and 24 CFR 92.254 for homeownership.**

Action Plan Annual Affordable Housing Goals response:

See summary Table 3B

### Needs of Public Housing (92.220(b))

**27. Describe the manner in which the plan of the jurisdiction will help address the needs of public housing and activities it will undertake during the next year to encourage public housing residents to become more involved in management and participate in homeownership.**

Action Plan Needs of Public Housing response:

Since the Section 8 Voucher Program was established, the Waukesha County Housing Authority contracted with the City of Waukesha Housing Authority to administer the Section 8 program and other housing authority activities. After meeting with U.S. Department of Housing and Urban Development, WCHA, and WHA, it was mutually agreed that for increased programmatic administrative efficiencies, and in the best interest of federal assets and the program participants, that all Section 8 vouchers be combined under WHA to administer the HCVP throughout the geographical area of Waukesha County, starting in 2014. This will allow participants to choose where they would like to live anywhere in Waukesha County. This will allow participants to seek employment opportunities that they may not have otherwise been able to, because of where they were living. The WHA shall set a goal of providing 35% of available vouchers outside of the City of Waukesha on an annual basis to benefit all communities within the County. The merging of the HCVP will save a substantial amount of money administratively. This is a much needed change due to the current and projected budget cuts the WHA, and WCHA have been experiencing.

Due to lack of funding, the WHA has been unable to assist additional households since October 2012. The goal of the WHA for 2014, will be to serve as many household as possible, without having to decrease the number of households we are currently serving. Many Housing Authorities across the nation have been forced to downsize the HCVP through attrition. The WHA will closely monitor its funding to avoid cutting the assistance to those families currently being served.

The WHA considers all residents of public housing, and participants of the HCVP to be part of the resident counsel. The WHA sends information to all clients explaining program changes, information on the Family Self Sufficiency Program which encourages home ownership by setting up an escrow account on behalf of the participant which can be used as a down payment on a home at the completion of the program. Any information the WHA receives on making home ownership a reality is made available at the WHA office. Residents of public housing are given the opportunity to provide comment as to the use of funds received from HUD for Capital Improvements.

28. If the public housing agency is designated as "troubled" by HUD or otherwise is performing poorly, the jurisdiction shall describe the manner in which it will provide financial or other assistance in improving its operations to remove such designation during the next year.

Action Plan Needs of Public Housing response:

The Waukesha County Housing Authority and the City of Waukesha Housing Authority were designated "substandard" by HUD in 2013. Waukesha County and the City of Waukesha staff have worked closely with HUD and the new Interim Director

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of the two housing authorities throughout 2013 to correct this situation. The goal for WHA in 2014 is to raise its HUD designation status from substandard to high performing. The WHA is well on its way in doing so. Some of the changes in 2013 are more timely reporting of required information, watching closely that funds are spent in the most beneficial manner, and in the public housing program making sure that vacancies are all filled timely to increase the flow of revenue. The WHA will also make sure that all funding grants that are made available are applied for if eligible. In addition, staff changes and progress on the consolidation of the housing authorities in Waukesha County (see above) will all help to raise the status to high performing.

## Antipoverty Strategy

**29.** Briefly describe the actions that will take place during the next year to reduce the number of poverty level families **(as defined by the Office of Management and Budget and revised annually), taking into consideration factors over which the jurisdiction has control.**

### Action Plan Antipoverty Strategy response:

In the absences of revised 2000 census data, the 2000 census data showed that Waukesha County had the second lowest percentage of households (2.1%) living in poverty among the largest 223 counties in the United States. This figure while encouraging is misleading and obscures the actual number of households (based on 2000 census data) living in poverty (11,092) which is the 8<sup>th</sup> highest actual number of the 72 counties in Wisconsin. The current economic conditions most likely have increased those numbers as unemployment and underemployment has impacted many households. All CDBG public service funding is intended to meet a specific need to address poverty or avoid poverty. Some funded CDBG activities are poverty prevention oriented such as childcare which allows parents to work while the child is in a safe environment. Healthy Families, Prevention and Protection of Abused Children, which protects children from abuse, senior programs, medical and dental programs, transportation and other programs which provide services which may not directly impact poverty, but provide a preventative service.

Other activities address the impact of poverty such as community meals, food pantry, and shelters. Waukesha County staff works with various agencies that represent the Continuum of Care to identify poverty related issues and how CDBG activities can help households in need of services. County agencies have developed a number of successful initiatives including:

- Accelerated SSI-D Eligibility Program
- Family Self Sufficiency
- Energy Pilot Arrearage Program
- Literacy Education
- Employment Re-Entry Program for Offenders

The way out of poverty is obtaining living wage employment. The County Workforce Development Center helps persons in preparing themselves for employment when the businesses are rehiring. A number of agencies serve specific client groups – Hispanic, Battered Women, Developmentally Disabled, Mentally Ill, and they may also provide specific job training to assist in obtaining a job and avoiding poverty.

## **Barriers to Affordable Housing**

30. Describe the actions that will take place during the next year to remove barriers to affordable housing.

### Action Plan Barriers to Affordable Housing response:

Waukesha County will assist potential homeowners with Downpayment Assistance, Homeowner Rehab Assistance and Purchase/Rehab Assistance with funds allocated through the HOME program. In addition, 15% of the 2014 allocation was allocated under the CHDO Reserve allocation for housing development assistance to a Community Housing Development Organization (CHDO). Besides these direct funds, Waukesha County works with lenders, real estate agents and Homebuyer Counseling agencies to keep them knowledgeable about available resources. The County will continue to work with municipalities on zoning and land use/density issues that may impact barriers to affordable housing. Finally, the County as a member of the regional housing study will provide input into the final report on regional housing.

31. Describe the actions that will take place during the next year to foster and maintain affordable housing.

### Action Plan Barriers to Affordable Housing response:

Waukesha County will continue to participate in the Waukesha Housing Action Coalition, Thrive Waukesha, The SEWRPC Regional Housing Study and to implement its county-wide comprehensive plan. Waukesha County has allocated \$225,000 in HOME and \$280,000 in CDBG Housing Rehabilitation funds to maintain affordable housing through Homeowner Rehab Programs.

## **Lead-based Paint**

32. Describe the actions that will take place during the next year to evaluate and reduce the number of housing units containing lead-based paint hazards in order to increase the inventory of lead-safe housing available to extremely low-income, low-income, and moderate-income families, and how the plan for the reduction of lead-based hazards is related to the extent of lead poisoning and hazards.

Action Plan Lead-based Paint response:

Waukesha County has developed a comprehensive lead based paint compliance plan related to the various housing rehabilitation programs funded with CDBG and HOME funds. The policies developed will ensure compliance with lead based paint compliance requirements and state certified contractors will undertake all work. The health departments within each county have been cooperative in coordinating the identification of possible lead based housing units. All housing units constructed prior to 1978 are assumed to contain lead based paint, any work on these units is closely monitored, and rehabilitation work monitored for safe work practices. Waukesha County contracts with two lead certified inspectors to undertake home inspections funded with CDBG/HOME funds.

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## HOMELESS

### **Specific Homeless Prevention Elements**

\*Please also refer to the Homeless Needs Table in the Needs.xls workbook.

33. Please describe, briefly, the jurisdiction's plan for the investment and use of available resources and describe the specific planned action steps it will take over the next year aimed at eliminating chronic homelessness by 2013. Again, please identify barriers to achieving this.

Action Plan Specific Homeless Prevention response:

Waukesha County works through a coalition of local agencies (Waukesha Housing Action Coalition) who coordinate efforts to eliminate chronic homelessness through a local Continuum of Care. Waukesha County does not receive a direct allocation of homeless funds through the Continuum of Care, but agencies are allocated homeless funds through the State. The Sources of Funds section outlined the current homeless funds to agencies.

Waukesha County will continue to directly fund homeless shelters and also fund prevention programs to help avoid homelessness.

For the past four years, Waukesha has opened a winter overflow shelter for homeless men. In 2012 the County allocated \$25,000 in county health and human services funds for the overflow shelter with local churches and other donations/volunteers helping to keep the overflow shelter open. This temporary shelter needs a permanent solution, as the current location will not be available in 2014. Waukesha County will continue to work with the coalition of churches and nonprofit groups to find a solution to this problem.

34. Homelessness Prevention—The jurisdiction must describe its planned action steps over the next year to address the individual and families with children at imminent risk of becoming homeless.

Action Plan Specific Homeless Prevention response:

Waukesha County will fund the following agencies, which specifically through their programs, work to prevent homelessness by providing resources and services to at-risk individuals and families.

Hope Center	Outreach Meals	\$ 34,000
Food Pantry	Food Distribution	\$ 10,000
Salvation Army	Community Meal Program	\$ 18,000
La Casa	Childcare	\$ 20,000
Women's Center	Sexual Abuse Services	\$ 7,000
Interfaith	Collaborative Trans.	\$ 6,500
Women's Center	Family Support	\$ 5,000
PPAC	Parent's Place	\$ 5,000
SBHF	Case Mgmt.	\$ 19,000
Family Services	Care Center	\$ 8,000
Women's Center	Crisis Line	\$ 7,000
TOTAL:		\$121,500

Besides the activities which prevent homelessness, Waukesha County funds, directly with CDBG funds agencies which oversee homeless or specific purpose shelters serving homeless or special need households as follow:

Agency	Population Served	2014 Funding
Hebron House of Hosp.	Families, single women	\$ 80,000
Hebron House of Hosp.	Single men	\$ 10,000
Salvation Army	Men	\$ 10,000
Women's Center	Domestic abuse	\$ 21,600
HOPE Center	Drop-in day shelter	\$ 15,000
Richard's Place	HIV/AIDS hospice	\$ 6,400
Family Promise	Families	\$ 15,000
TOTAL:		\$ 158,000

35. Discharge Coordination Policy—The jurisdiction must certify it established a policy for discharge of persons from publicly funded institutions or systems of care (such as health care facilities, foster care, or other youth facilities, or correction programs and institutions) in order to prevent such discharge from immediately resulting in homelessness for such persons. (91.225 (c)(10))

Action Plan Specific Homeless Prevention response:

As part of the Continuum of Care, in which all shelter providers participate, a discharge policy is in place and has been approved by the State.

Since Waukesha County is not a direct recipient of CoC funds, it is not required to sign off on a Discharge Coordination Policy.

## Emergency Shelter Grants (ESG)

36. If applicable, describe how the ESG matching requirements will be met.

Action Plan ESG response:

N/A

37. (States only) Describe the process for awarding grants to State recipients, and a description of how the allocation will be made available to units of local government.

Action Plan ESG response:

N/A

## NON-HOMELESS SPECIAL NEEDS HOUSING

### Non-homeless Special Needs (91.220 (c) and (e))

***\*If not using the CPMP Tool:*** Complete and submit Table 1B.

***\*If using the CPMP Tool:*** Complete and submit Needs Table/Non-Homeless Needs.

38. Please describe any supportive housing activities being undertaken to address the priority housing needs of persons who are not homeless (elderly, frail elderly, persons with disabilities, persons with HIV/AIDS, persons with alcohol or other substance abuse problems).

Action Plan Non-homeless Special Needs response:

Waukesha County provides a number of non-homeless special needs, some of which serve residents county-wide and others are directed toward residents of the three Neighborhood Revitalization Strategy Areas. Most of the specific activities were identified in the five-year planning focus groups to meet identified needs.

Following are areas of non-homeless special need funding:

- Localized transportation – Purchase of replacement vehicles for local senior and ambulatory disabled.
- Senior programs to assist seniors in living independently.
- Medical/dental activities providing medication assistance and dental care for households without insurance and free clinics for persons without medical insurance.
- Food/Nutrition activities including food pantry, summer youth food, community meals

- Child Abuse Prevention including activities related to sexual abuse counseling, child abuse family counseling and parenting skills
- Youth Opportunities provided through a separate RFP process to provide youth programs to become good students and citizens
- All Community Development activities are detailed in this report including non-homeless special needs.

## COMMUNITY DEVELOPMENT

### Community Development Block Grant

**\*If not using the CPMP Tool:** Complete and submit Table 2B, Table 1C Summary of Specific Objectives.

**\*If using the CPMP Tool:** Complete and submit the Needs Worksheets/Non-Housing Community Development and Summary of Specific Annual Objectives Worksheets or Summaries.xls

39. Identify the estimated amount of CDBG funds that will be used for activities that benefit persons of low- and moderate-income (an amount generally not to exceed ten percent of the total available CDBG funds may be excluded from the funds for which eligible activities are described if it has been identified as a contingency for cost overruns.)

#### Action Plan Community Development response:

In 2014, Waukesha County's projected allocation of CDBG funds is \$1,334,028. Of that number, \$266,805 was allocated for administration and Fair Housing activities, which may or may not impact low and moderate income persons. The balance of funds \$1,067,223 (80% of funds) will directly benefit LMI or presumed benefit to LMI persons.

#### \*HUD Outcomes/Objectives Chart

Outcomes >>> Objectives v v v	Availability/ Accessibility	Affordability	Sustainability
Decent Housing	DH-1	DH-2	DH-3
Suitable Living Environment	SL-1	SL-2	SL-3
Economic Opportunity	EO-1	EO-2	EO-3

Waukesha County has also developed eleven Community Development criteria related to funded activities which are outlined below:

2014 Proposed Activities		
Community Development		
CD-1	Provide assistance to persons and/or families to mitigate or prevent homelessness	<b>SL-1</b>
CD-2	Provide Public Services for residents county-wide or in specific communities.	<b>SL-1</b>
CD-3	Provide assistance to seniors, persons w/special needs including support services and transportation services	<b>SL-1</b>
CD-4	Acquire, and/or make accessible or renovate buildings for delivery of services to income-eligible persons	<b>SL-1</b>
CD-5	Provide assistance to businesses to create and/or retain jobs for LMI persons	<b>SL-1</b>
CD-6	Create jobs for LMI persons with transit or workforce connections	<b>EO-1</b>
CD-7	Improve targeted neighborhoods through variety of initiatives including park and infrastructure improvements	<b>EO-3</b>
CD-8	Provide public services for residents of 3 NRSAs	<b>SL-3</b>
CD-9	Develop and/or acquire/rehab units affordable as workforce housing in outlying Consortium areas	<b>DH-1</b>
CD-10	Preserve and maintain historic properties	SL-3
CD-11	Effective overall program administration including Fair Housing Effective Planning	

Applicant Agency	Activity Description	Funding Amount	Outcome/ Objective
<b>Public Service/Shelters</b>			
Hebron House Emergency Shelter	Shelter/families & single women	CDBG \$80,000	<b>CD-1/SL-1</b>
Salvation Army Emergency Lodge	Shelter/men	CDBG \$10,000	<b>CD-1/SL-1</b>



Women's Center Sister House	Shelter/women & children	CDBG \$21,600	CD-1/SL-1
Hebron House Jeremy House	Shelter/persons w/mental illness	CDBG \$10,000	CD-1/SL-1
Hope Center	Homeless Day Shelter	CDBG \$15,000	CD-1/SL-1
Family Promise	Shelter / families	CDBG \$15,000	CD-1/SL-1

### Public Services/Food and Nutrition

Food Pantry of Waukesha County	Food Distribution Special Diet Food	CDBG \$10,000	CD-2/SL-1
Caring Place	Meals on Wheels	CDBG \$ 4,500	CD-8/SL-3
Salvation Army	Community Meals	CDBG \$18,000	CD-8/SL-3
Hope Center	Community Meals	CDBG \$34,000	CD-8/SL-3

### Public Services/Transportation

Elmbrook Senior Taxi	Senior/Ambulatory Disabled	CDBG \$8,000	CD-3/SL-1
Interfaith	Transportation Collaborative (NRSA)	CDBG \$6,500	CD-8/SL-3
Muskego Senior Taxi	Senior/Ambulatory Disabled	CDBG \$ 8,000	CD-3/SL-1

### Public Services/Medical & Dental

Community Outreach Health	Prescription Assistance	CDBG \$8,000	CD-2/SL-1
Lake Area Free Clinic	Prescription Assistance	CDBG \$ 8,000	CD-2/SL-1
St. Joe's Medical	Prescription Payments	CDBG \$10,500	CD-8/SL-3
Waukesha Dental Clinic	Tots and Teens Dental Clinic	CDBG \$15,000	CD-8/SL-3
Waukesha Dental Clinic	Adult Dental Clinic	CDBG \$15,000	CD-8/SL-3

<b>Public Services/Family &amp; Individual Assistance</b>				
Women's Center	Sexual Abuse Prevention	CDBG	\$7,000	<b>CD-8/SL-3</b>
Family Services	CARE Center	CDBG	\$8,000	<b>CD-8/SL-3</b>
Safe Babies, Healthy Families	Case Management	CDBG	\$19,000	<b>CD-8/SL-3</b>
La Casa de Esperanza	Child Care	CDBG	\$20,000	<b>CD-8/SL-3</b>
Literacy Council	Literacy Outreach	CDBG	\$4,500	<b>CD-8/SL-3</b>
Prevention and Protection of Abused Children	Parent's Place	CDBG	\$5,000	<b>CD8/SL-1</b>
Women's Center	Crisis Line	CDBG	\$7,000	<b>CD-2/SL-1</b>
Big Brothers, Big Sisters	Mentor Program	CDBG	\$10,000	<b>CD8/SL-1</b>
180 Degree Juvenile Diversion	Creating Lasting Families	CDBG	\$4,500	<b>CD-8/SL-3</b>
St. Charles Youth and Family Services	Educational Support	CDBG	\$2,736	<b>CD-8/SL-1</b>
City of Waukesha	Adaptive Recreation	CDBG	\$9,500	<b>CD-2/SL-1</b>
	Sentinel Park Summer Program	CDBG	\$8,000	<b>CD-2/SL-1</b>
Women's Center	Family Support	CDBG	\$5,000	<b>CD-8/SL-1</b>
City of Waukesha	Haertel Field Summer Program	CDBG	\$8,000	<b>CD-2/SL-1</b>
<b>Public Services/Senior Assistance</b>				
Interfaith	Faith in Action (NRSA)	CDBG	\$8,500	<b>CD-3/SL-1</b>
City of Waukesha Parks & Rec	Senior Coordinator	CDBG	\$13,000	<b>CD-3/SL-1</b>

Public Facilities/Improvements			
City of Waukesha	Landmark Historic Springs	CDBG \$20,000	CD-10/SL-3
City of Waukesha	ADA compliance/Street Reconstruction	CDBG \$48,500	CD-4/SL-1
Adaptive Community Approach Program	Art Studio Accessibility	CDBG \$2,191	CD-4/SL-1
Easter Seals Southeast WI	ADA Parking Lot Paving	CDBG \$13,000	CD-4/SL-1
Town of Vernon	ADA Parking Lot and Walkway	CDBG \$37,000	CD-4/SL-1
Town of Genesee	ADA Water Accessibility	CDBG \$10,000	CD-4/SL-1
City of Oconomowoc	ADA Restroom	CDBG \$50,000	CD-4/SL-1

Economic Development			
Waukesha County Economic Development Corporation	Business Loans (RLF)	CDBG \$450,000	CD-5/EO-3

Administration/Planning			
Metro Milwaukee Fair Housing Council	Fair Housing Services	CDBG \$15,000	CD-11
Wisconsin Partnership for Housing Development	Administering a CDBG homeowner rehab program	CDBG \$10,000	CD-11
Waukesha County	Administration	CDBG \$268,000	CD-11
UW-Extension	Haertel Field NRSA Strategic Plan	CDBG \$20,000	CD-11
City of New Berlin	Fair Housing Marketing Materials	CDBG \$3,600	CD-11

Housing			
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City of Waukesha	Housing Rehabilitation	CDBG \$70,000	H-1/DH-3
City of Waukesha	Landmark Paint and Repair Program for Homeowners	CDBG \$10,000	CD-9/DH-1
WI Partnership	Housing Rehabilitation	CDBG \$200,000	H-1/DH-3

**40.CDBG resources must include the following in addition to the annual grant:**

- a. Program income expected to be received during the program year, including:**
- i. The amount expected to be generated by and deposited to revolving loan funds;**

Community Development response:

The amount of program income (PI) generated annually can vary from year to year. In 2012, a total of \$731,363.03 was received in program income. Of that total, \$622,350.74 is in a revolving business loan account for business loans through the Waukesha County Economic Development Corporation. The previous two years, PI was \$719,012.66 and \$386,964.06. The three year PI average is \$612,446.58. Based on these figures, we anticipate the PI for 2014 to be \$565,000 with \$365,000 of that in revolving loan PI.

Waukesha County has no outstanding float loan, therefore, will not receive any float loan income.

**The total amount expected to be received during the current program year from a float-funded activity described in a prior statement or plan.**

Community Development response:

**N/A**

- b. Program income received in the preceding program year that has not been included in a statement or plan;**

Community Development response:

No program income received in the preceding year was not included in a statement or plan.

- c. Proceeds from Section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives in its strategic plan;**

Community Development response:

No, Section 8 loan is outstanding or was undertaken.

- d. Surplus funds from any urban renewal settlement for community development and housing activities; and**

Community Development response:

No, surplus urban renewal funds are available.

- e. Any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan.**

Community Development response:

Waukesha County did not return any funds to the Line of Credit.

**41. NA If a jurisdiction intends to carry out a new CDBG float-funded activity, the jurisdiction's plan must include the following information:**

- f. For the program income included in 1(b) above, the jurisdiction should identify the month(s) and year(s) in which the program income will be received; and which of the following options it will take for each float-funded activity to address the risk that the activity may fail to generate adequate program income:**
- i. amend or delete activities in the amount equal to any amount due from default or failure to produce sufficient income in a timely manner. (If this option is chosen, the action plan must include a description of the process it will use to select activities to be amended or deleted and how it will involve citizens in that process), OR**
  - ii. obtain an irrevocable line of credit from a commercial lender for the full amount of the float-funded activity. (If this option is chosen, information on the float-funded activity in the action plan must include the lender and the terms of the irrevocable line of credit), OR**
  - iii. agree to transfer general local government funds to the CDBG line of credit in the full amount of any default or shortfall within 30 days of the float-funded activity's failure to generate projected program income on schedule.**

Community Development response:

**N/A**

41. Identify the jurisdiction's priority non-housing community development needs eligible for assistance by CDBG eligibility category specified in the Community Development Needs, public facilities, public improvements, public services and economic development. **(Use of Table 2B or the Community Development Needs Table is sufficient, additional narrative is not required)**

- a. **For activity for which the jurisdiction has not yet decided on a specific location, such as when a jurisdiction is allocating an amount of funds to be used for making loans or grants to businesses or for residential rehabilitation, provide a description of who may apply for the assistance, the process by which the grantee expects to select who will receive the assistance (including selection criteria), and how much and under what terms the assistance will be provided.**

Community Development response:

Waukesha County provides Housing Rehabilitation funds on a first come eligible basis regardless of where the household is located in participating CDBG municipalities. There is no criterion on who can benefit as long as the household is income qualified, and the household is not delinquent in payments or taxes. For business loans, a loan committee has been established to conduct a feasibility analysis for a loan approval. The business must also be able to create jobs for low and moderate-income persons. Any business located within a participating CDBG municipality is eligible to apply.

42. Identify specific long-term and short-term community development objectives (including economic development activities that create jobs), developed in accordance with the statutory goals described in section 24 CFR 91.1 and the primary objective of the CDBG program to provide decent housing and a suitable living environment and expand economic opportunities, principally for low- and moderate-income persons.

**(Use of Table 2B or the Community Development Needs Table and Summaries Table is sufficient, additional narrative is not required)**

The CDBG program established long term community development objectives in its Five Year Consolidated Plan and annually analyzes how the goals are being met with emphasis on economic development job creation, housing production and maintenance of the housing stock and providing a better and more suitable living environment through public services and accessibility improvements.

Waukesha County hired a consultant to review the Consolidated Plan and mark the progress toward goals.

**43. An “urgent need” activity may be included in the action plan only if the jurisdiction certifies that the activity is designed to meet other community development needs having a particular urgency because existing conditions pose a serious and imminent threat to the health or welfare of the community and other financial resources are not available.**

Community Development response:

No urgent need activities are anticipated.

## **HOME/ American Dream Down payment Initiative (ADDI)**

☐ **NA**

44. Describe other forms of investment not described in § 92.205(b).

Action Plan HOME/ADDI response:

Waukesha County, through the HOME Consortium, allocates HOME funds to three core programs: Downpayment Assistance, Housing Rehabilitation, and Purchase/Rehabilitation. The HOME Consortium sets aside the HOME required 15% of funds for CHDO development. Any unallocated funding, or program income, is usually set aside for non-CHDO development projects.

45. Describe how HOME matching requirements will be satisfied?

Action Plan HOME/ADDI response:

The HOME match will be met through contribution of resources, volunteer hours, equipment or other sources on Habitat for Humanity developments, developer contribution, or local governmental tax incremental financing rehabilitation projects.

46. If the participating jurisdiction (PJ) will use HOME or ADDI funds for homebuyers, it must state the guidelines for resale or recapture, as required in § 92.254 of the HOME rule.

Action Plan HOME/ADDI response:

In the event of a voluntary or involuntary transfer of a property during the applicable period of affordability, Waukesha County will recapture all or a portion of the direct subsidy provided to the homebuyer. This direct subsidy is provided as downpayment assistance in the form of a deferred 0% interest loan. The loan will be forgiven prorated over the period of affordability (5 years) as long as the home remains the principal residence of the homebuyer. If the net proceeds from a voluntary or involuntary sale are insufficient to repay the prorated amount of the HOME subsidy, Waukesha County shall recapture the balance due on the loan or 100% of net proceeds from the sale, whichever is less. If there are no net proceeds from the sale, no repayment is required. Net proceeds is defined as the sales price minus superior loan repayment and any closing costs incurred by the homebuyer.

47. Describe the policy and procedures the PJ will follow to affirmatively market housing containing five or more HOME-assisted units.

Action Plan HOME/ADDI response:

Waukesha County has developed a marketing plan requiring affirmative marketing of developments assisted with HOME funds.

48. Describe actions to be taken to establish and oversee a minority outreach program within the jurisdiction to ensure inclusion, to the maximum extent possible, of minority and women, and entities owned by minorities and women, including without limitation, real estate firms, construction firms, appraisal firms, management firms, financial institutions, investment banking, underwriters, accountants, and providers of legal services, in all contracts, entered into by the PJ with such persons or entities, public and private, in order to facilitate the activities of the PJ to provide affordable housing under the HOME program or any other Federal housing law applicable to such jurisdiction.

Action Plan HOME/ADDI response:

Waukesha County will administer its HOME, CDBG, NSP and other federally funded programs in a manner that will further the purposes of federal, state and local affirmative marketing and equal opportunity requirements. To that end, Waukesha County will:

1. Conduct its affirmative marketing and outreach to Minority Business Enterprises (MBE) and Women Business Enterprises (WBE) in conformance with 24 CFR Part 85.36 (e).
2. Include the HUD required Section 3 clause in all covered contracts.  
Section 3 applies to:
  - a) Projects for which HUD's share of the project cost exceeds \$200,000; and
  - b) Contracts and subcontracts awarded on projects for which HUD's share of the project cost exceeds \$200,000; and the contract and subcontract exceeds \$100,000.



3. Compile and utilize a listing of all known MBE's and WBE's in Waukesha County and the four county HOME Consortium area.
4. Encourage MBE's and WBE's to participate in Waukesha County's HOME, CDBG, NSP and other federally funded programs.
5. Require HOME, CDBG and NSP Program sub-recipients, contractors and subcontractors to take affirmative steps to use MBE's and WBE's in federally funded projects.
6. Require HOME, CDBG and NSP Program sub-recipients, contractors and subcontractors to maintain appropriate records to document the number and types of contracts and subcontracts it awards, the dollar value of each award, and the gender and ethnic/racial status of the management/ownership of the business.

Outreach and recruitment of MBE, WBE, Section 3, and Small Businesses will be accomplished through implementation of the following steps outlined in this plan:

1. In 2014, MBE, WBE, Section 3 and Small Business outreach information will be posted on the City of Waukesha Community Development website at [www.waukeshacounty.gov/communitydevelopment](http://www.waukeshacounty.gov/communitydevelopment).
2. Waukesha County will develop a MBE/WBE/Section 3 and Small Business brochure.
3. Waukesha County staff will check the State of Wisconsin Department of Commerce MBE/WBE website for area certified MBEs/WBEs and include them in any solicitation lists and lists to prime contractors bidding on projects.
4. Staff will compile and maintain a listing of small businesses, MBEs, WBEs and Section 3 Businesses including their capabilities, services, and/or supplies or products in the four county area.
5. Staff will mail or email recruitment and outreach notices and information for MBE, WBE and Section 3 Businesses to at least the following organizations on an annual basis; The Workforce Development Centers of Waukesha, Washington and Ozaukee Counties, Waukesha County Technical College, the Urban League, United Migrant Opportunity Services (UMOS), Wisconsin Women's Initiative Business Corp. (WWIBC), Wisconsin Department of Commerce, the Workforce Development Center of Jefferson County, the Waukesha County Business Alliance, and the Waukesha County Economic Development Corporation.

49. **√NA** If you intend to use HOME funds for Tenant-Based Rental Assistance, describe the local market conditions that led to the use of the HOME funds for a tenant-based rental assistance program.

Action Plan HOME/ADDI response:

50. **√NA** If the TBRA program will target or provide preference for a special needs group, identify that group from the Consolidated Plan as having an unmet need and show that the preference is needed to narrow the gap in benefits and services received by that population?

Action Plan HOME/ADDI response:

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51. ☒ **NA** If the PJ will use HOME funds to refinance existing debt secured by multifamily housing that is that is being rehabilitated with HOME funds, it must state its refinancing guidelines required under § 92.206(b). The guidelines shall describe the conditions under which the PJ will refinance existing debt. At a minimum these guidelines must:

- a. Demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing.
- b. Require a review of management practices to demonstrate that disinvestments in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving the targeted population over an extended affordability period can be demonstrated.
- c. State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.
- d. Specify the required period of affordability, whether it is the minimum 15 years or longer.
- e. Specify whether the investment of HOME funds may be jurisdiction-wide or limited to a specific geographic area, such as a neighborhood identified in a neighborhood revitalization strategy under 24 CFR 91.215(e)(2) or a Federally designated Empowerment Zone or Enterprise Community.
- f. State that HOME funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.

Action Plan HOME/ADDI response:

52. ☒ **NA** If the PJ is going to receive American Dream Down payment Initiative (ADDI) funds, please complete the following narratives:

- a. Describe the planned use of the ADDI funds.
- b. Describe the PJ's plan for conducting targeted outreach to residents and tenants of public housing and manufactured housing and to other families assisted by public housing agencies, for the purposes of ensuring that the ADDI funds are used to provide down payment assistance for such residents, tenants, and families.
- c. Describe the actions to be taken to ensure the suitability of families receiving ADDI funds to undertake and maintain homeownership, such as provision of housing counseling to homebuyers.

Action Plan HOME/ADDI response:

## **Housing Opportunities for People with AIDS** ☒ **NA**

**\*If not using the CPMP Tool:** Complete and submit Table 1B.

**\*If using the CPMP Tool:** Complete and submit Needs Table/HOPWA.

Provide a Brief description of the organization, the area of service, the name of the program contacts, and a broad overview of the range/ type of housing activities to be done during the next year.

Action Plan HOPWA response:

53. Specify the one-year goals for the number of low-income households to be provided affordable housing using HOPWA funds for short-term rent, mortgage, and utility payments to prevent homelessness; tenant-based rental assistance, units provided in housing facilities that are being developed, leased, or operated.

Action Plan HOPWA response:

54. Please describe the expected trends facing the community in meeting the needs of persons living with HIV/AIDS and provide additional information regarding the administration of services to people with HIV/AIDS.

Action Plan HOPWA response:

55. Identify the method for selecting project sponsors (including providing full access to grassroots, faith-based and other community organizations).

Action Plan HOPWA response:

56. Please note any evaluations, studies or other assessments that will be conducted on the local HOPWA program during the next year.

Action Plan HOPWA response:

## Other Narrative

Include any Action Plan information that was not covered by a narrative in any other section.